

United States District Court

United States District Court  
Southern District of Texas  
FILED

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

OCT 16 2014

UNITED STATES OF AMERICA

David J. Bradley, Clerk

V.

CRIMINAL COMPLAINT

Ramon Chasco

A202 085 177

YOB:

1974

Principal

United States

Maximiliano Garcia-Suarez

A205 722 308

YOB:

1993

Co-Principal

the United Mexican States

Case Number:

M-14-2012-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 14, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Cesar Escobar-Escobar and Hugo Monge-Fuentes, citizens and nationals of El Salvador and two (2) other undocumented aliens for a for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Edinburg, Texas to the point of arrest near San Manuel, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On October 14, 2014, Border Patrol Agents assigned to Operation Shortstop were patrolling U.S. Highway 281 in San Manuel, Texas. At approximately, 7:40 p.m., Agents observed a grey Nissan Altima traveling northbound on U.S. Highway 281. The vehicle was riding low in the rear as if it was carrying something heavy.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint

☒ Yes ☐ No

Agreed to file:  
[Signature]  
TXSD  
10-16-14

[Signature]  
Signature of Complainant

Eduardo Cortez Senior Patrol Agent  
Printed Name of Complainant

Sworn to before me and subscribed in my presence,

October 16, 2014  
Date

9:15am at

McAllen, Texas  
City and State

Peter E. Ormsby, U. S. Magistrate Judge  
Name and Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

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**CONTINUATION:**

Agents drove behind the vehicle to take a closer look and observed four occupants inside the vehicle. The vehicle was riding lower in the rear of the vehicle not consistent with the amount of passengers in the vehicle. As Agents maintained driving alongside the vehicle, they observed two of the occupants in the rear passenger seat ducking down as if they were trying to conceal themselves. Agents also noticed that the driver did not look in their direction and appeared rigid. Agents then proceeded to conduct a vehicle stop to conduct an immigration check on the occupants.

The vehicle stopped without incident and Agents made contact with the driver and the passengers. The driver, Ramon Chasco was determined to be a U.S. Citizen and the passengers were determined to be undocumented aliens illegally in the United States.

Furthermore, Agents received consent from CHASCO to look into the trunk of the vehicle and he willfully stated that there were two more subjects concealed in the trunk. Both subjects in the trunk freely stated that they were not in possession of any documents allowing them to enter or reside in the United States legally. The driver along with the five other passengers in the vehicle were then transported to the Weslaco Border Patrol Station for further questioning and processing. None of the subjects apprehended claimed to be injured in any way.

**PRINCIPAL STATEMENT:**

Once at the Weslaco, Texas Border Patrol Stations, Ramon CHASCO, was advised of his Miranda Rights and stated that he understood his rights and agreed to answer questions without an attorney present.

CHASCO stated that he had made arrangements with a friend of his to pick up undocumented aliens at an apartment building located in Edinburg, Texas. He stated that he was going to get paid a total sum of \$500.00 U.S.D. Upon arriving at the apartment building, a male by the name of "JR" instructed a total of five subjects to enter the vehicle, to include the foot guide of the group. CHASCO identified the foot guide as the person sitting in the front passenger seat. Two other subjects sat in the rear seat, and an additional two subjects entered the trunk of the vehicle. CHASCO was able to identify Maximiliano GARCIA-Suarez in a photo lineup as the footguide of the group.

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**CONTINUATION:**

**CO-PRINCIPAL STATEMENT:**

Once at the Weslaco Station, Maximiliano GARCIA-Suarez was advised of his Miranda Rights, in the Spanish language. GARCIA indicated that he understood his rights and agreed to answer questions and make a statement without a lawyer present.

GARCIA stated he has been working as a foot guide for about two years. This was going to be his first time to work for an individual he knew only as "El Tio." GARCIA said he was going to get paid \$500 per undocumented alien he guided through the brush to circumvent the U.S. Border Patrol Checkpoint located in Falfurrias, Texas. He went on to mention that he sat in the front passenger seat of the vehicle. GARCIA stated "El Tio" also instructed two undocumented aliens to get inside the trunk of the vehicle and two other undocumented aliens to sit inside in the rear seats of the vehicle. GARCIA stated CHASCO was aware of the two undocumented aliens inside his trunk of his vehicle. GARCIA identified Ramon CHASCO, as the driver of the vehicle who transported him along with four other undocumented aliens.

**MATERIAL WITNESS STATEMENTS:**

At the Weslaco Border Patrol Station, the two material witnesses were advised of their Miranda Rights in their preferred language. They all stated that they understand their rights and were willing to provide statements without the presence of an attorney.

1. Cesar Escobar-Escobar stated that he is a citizen and national of El Salvador. He admitted to illegally crossing into the United States in an attempt to go to Houston, Texas. Escobar told Agents that he had made arrangements with an unknown smuggler in El Salvador to be brought into the U.S. Additionally, he stated that he paid a sum of \$8,000.00 U.S.D. to be smuggled into the U.S. Escobar went on to say that after waiting at an apartment complex he entered a blue car and sat behind the passenger seat. Escobar was shown a Department of Homeland Security approved photo lineup and identified Ramon CHASCO, as the driver of the vehicle who transported him along with four other undocumented aliens.

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2. Hugo Monge-Fuentes stated that he is a citizen and national of El Salvador. He willfully admitted that he had paid \$8,000.00 U.S.D. to be smuggled to Washington D.C. After illegally entering the U.S. he stated that he had been taken to several different stash houses. Prior to being apprehended he mentioned that he was being held at a house and that an unknown man walked him out of the house and told him to get into the back seat of a particular car and lay down. After several minutes the driver and the passenger entered the vehicle and then they drove off. Monge went on to say that they drove for approximately thirty minutes before being pulled over by authorities. Monge was shown a DHS approved photo lineup and was able to identify CHASCO as the driver of the vehicle.